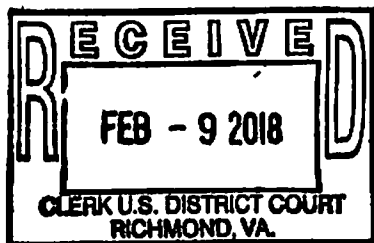


Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

Eastern District of VirginiaRichmond Division

Amy Geist

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Reginald  
(Reggie) Newsome (and others)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 3:18-cv-00094-JAG

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Amy Elizabeth Geist

Street Address

2618 Iverson Rd.

City and County

Midlothian, Chesterfield

State and Zip Code

Virginia 23112

Telephone Number

804-763-0909

E-mail Address

geistamy319@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

## III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I was sexually abused by my father.  
To compound matters, the psychiatric system  
and psych drug makers failed/damaged me.

## IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Pain & suffering for 30+ years  
<5 Billion Dollars>  
Bad reactions to drugs they  
were giving me. Therapy for life.  
Negligent Emotional Distress

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

2/7/18

Signature of Plaintiff

Printed Name of Plaintiff

*Amy E. Geist*  
 \_\_\_\_\_  
 Amy E. Geist

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

18 U.S.C. 2242  
18 U.S.C. 2243 + Negligent  
18 U.S.C. 2244 Emotional  
Distress

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) \_\_\_\_\_, is a citizen of the  
State of (name) \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

**Pro Se 1 (Rev. 12/16) Complaint for a Civil Case****Defendant No. 1**

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

Reginald Wayne Newsome  
 retired  
 4201 N. Bailey Bridge Rd  
 Midlothian, Chesterfield  
 Va. 23112  
 (804) 437-4865  
 reggieatm@yahoo.com

**Defendant No. 2**

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

American Psychiatric Assoc.  
 800 Main Ave SW  
 Washington DC  
 Washington DC  
 Va. 23112  
 (703) 907-7300

**Defendant No. 3**

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

HCA Virginia Health Systems  
 7101 Jahnke Rd.  
 Richmond, Rich City county  
 Va. 23235  
 (804) 483-0000

**Defendant No. 4**

Name  
 Job or Title (if known)  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address (if known)

Astra Zeneca  
 701 Pennsylvania Ave  
 New Brunswick, middlesex  
 New Jersey 08933  
 1-800-236-9933

Pfizer 1-800-879-3477  
1211 Sherwood Ave Richmond, Richmond  
Richmond, Virginia 23220

Johnson & Johnson 1-800-526-3967  
One Johnson & Johnson Plaza New Brunswick, Middlesex  
New Brunswick, NJ 08933

Heart Havens (804) 237-6097  
812 Moorefield Park Dr Richmond, Chesterfield  
#301  
North Chesterfield Va 23236

Child Protective Services 1-800-552-7096  
801 E. Main Street Richmond, Henrico  
Richmond, Va 23219

Phillip Marshall (804) 288-1881  
2006 Bremon Rd Richmond, Henrico  
#101  
Richmond Va 23226

Mario Gomez and Meredith Ragan (804) 353-0010  
5918 Harbour Ln Midlothian, Chesterfield  
Midlothian Va 23112  
Anastasia Jones 804 775-0500  
707 East Main Street Richmond, Richmond  
Richmond, Va 23219

Powhatan High School (804) 598-5710 Richmond, Powhatan  
1800 Judes Ferry Rd  
Powhatan Va 23139

Powhatan Sheriff's Department (804) 598-5656 Richmond, Powhatan  
3880 Old Buckingham Road  
#A  
Powhatan, Va 23139

Powhatan-Goochland Mental Health (804) 536-5400 Richmond, Powhatan  
3910 Old Buckingham Road  
#A  
Powhatan, Va 23139

Powhatan Rescue Squad (804) 598-2911 Richmond, Powhatan  
3920 Marion Harland Lane  
Powhatan Va 23139

Richmond Behavioral Health Authority (804) 819-4000

107 S 5<sup>th</sup> Street  
Richmond, Virginia Richmond, Richmond

Department of Behavioral Health and Development Services (804) 786-3921  
1220 Bank Street  
Richmond, Virginia 23219 Richmond, Richmond

Tucker Pavilion (804) 483-0000  
7101 Jahnke Road  
Richmond, Va. 23235 Richmond, Richmond

Galveston County Police Department (409) 765-3702  
601 54<sup>th</sup> St  
Galveston, Texas 77551 Galveston, Galveston

United States Army (877) 858-0673  
7833 Vervain Ct  
Springfield, Va 22152 Springfield,

(American Disabilities Act)  
National Council on Disability (202) 272-2004  
1221 F NW Washington DC 20004 Washington DC

*Clerk of Court Copy*

### **INTRODUCTION:**

I would like to introduce myself to you. Who I am in reality and who I am on paper couldn't be more diabolically opposed. My psych history and my true personage are polar opposites. This has proven to be extremely detrimental to the course of my life. I have been labeled as having 6 different "illnesses" in the past thirty years. No one knows how to diagnose me because I am nothing more than a victim of a cold, manipulative father with a penchant for pedophilia.

At worst I have ADHD and PTSD. However, the psychiatric system keeps saying I have cluster A or B personality disorders...This is patently untrue. I have just had to cope with sexual perversion from a very young age. They keep plying me with their useless poisons and nothing has helped me. I bet I've been subject to 30 or 40 different medicines that are improper for my condition and no one will listen to me. Pharmaceuticals are big business. Once you are in the system there is no getting away from it. If you refuse medications they will COURT ORDER you to take them.

I have had the following four drugs cause me grievous damage by worsening my existing PTSD: Seralquel, Risperdal, Geodone, and Haldol. They are immeasurably dangerous to people with or without mental illnesses and I aim to prove mental health patients are nothing but Guinea pigs for the drug makers. Psychiatrists just throw pills at you and hope that you become manageable. What you get depends on the amount of the kickback to doctors and hospitals. Everyone's physiological make up is different, so one NEVER knows how any given drug can affect someone.

### **COMPLAINT:**

I have no memories before the age of eight. I've tried many times to recall events prior to eight, however, most of them I do not have. I understand as an adult that my mind shut off the memories for me, because they were too frightening to deal with, in the interest of protecting itself. My mother did the same thing. My father is a Narcissist who has a proclivity for child sexual abuse.

My brother and I both strongly suspect/ have limited memories of being molested by my dad. The two of us would be excellent witnesses but for my brother's criminal record. Since there is extensive evidence of his substance abuse and anger management problems his word is considered NOT CREDIBLE.

My father is a predator that set out to control or silence all of his children who he systematically sexually battered progressively for years. He is a cunning and cold man with great intelligence and no soul. His eyes are as vacant as his heart. He has no feeling but serving himself.

He threw my brother and I under the bus in different ways to MAKE SURE our words weren't credible. He fooled a whole psychiatric system and police entity into thinking that my brother and I were problems and NO ONE listened to our word. WE WERE the victims and he was the monster. We got a ruined life and he got freedom.

I am here to petition the court to hear my story of abuse at the hands of my father and twenty one other businesses/people who failed to hear me and are COMPLICIT in not properly caring for me and other people in psychiatric institutions. They are also CULPABLE in keeping a child molester NOT responsible for his actions while a young girl lives in the house with him.

Since I am patently not crazy and I erroneously got thrown into institution after institution by my sadistic father....my word carries little weight. I have been trying to tell this story for 30 years. I have been witnessing the abuse of mentally ill patients since I was 12 years old. It is a lot better than it was in the 80's, however, the United States Mental Health System is HORRIBLY BROKEN.

The reason it is not being fixed is because it is a racket for drug makers. I AM SICK AND TIRED of seeing people with disabilities being mistreated. They have it difficult enough without the stigma that comes attached to anyone who is experiencing a mental health challenge. I have been screaming about it for years only to fall on deaf ears, These psych drugs are creating zombies and having devastating and frightening effects on the people who are institutionalized. I don't know if it's being ignored or

there needs to be awareness, but it needs to STOP. If you won't willingly take their poison they will COURT ORDER YOU to take it! These people with disabilities are HELPLESS!

My reputation on paper caused me to lose custody of my son, as well. The Powhatan High School truant officer didn't listen to me that my son was choking me! They ripped him out of MY house and gave him to my MOM and he never got past 9<sup>th</sup> grade! They owe me things I can never get back like three years of my life that my relationship with my son was not what it should have been. They also owe him an education because they thought the problem was me and the real problem was never fixed.

There are soooo many people who I feel owe me fiscal compensation for their blatant disregard for me and others who face special challenges. I would like to see from now on, all public officials have to take a sensitivity class and psych classes before dealing with the public.. I would also like to see drug makers held more accountable for the side effects that their drugs give us.

After you hear the WHOLE story you will see what I mean. There is some heinous abuse going on in the mental health field and I want to tell the highest court I can about it. Someone REALLY needs to know.

Please hear my case. It is the Eastern Division and I feel I deserve to not be SILENCED anymore. Thank you for your valuable time.

**LIST OF DEFENDANTS:**

**AMY GEIST VS.:**

*Reggie Newsome  
American Psychiatric Association  
Hospital Corporation of America  
Astra Zeneca  
Pfizer  
Johnson and Johnson  
Heart Havens  
Child Protective Services  
Phillip Marshall  
Mario Gomez  
Anastasia Jones  
Meredith Ragan  
Powhatan County High School  
Powhatan County Police Department  
Powhatan County Rescue Squad  
Powhatan-Goochland Mental Health  
Richmond Behavioral Health Authority  
Department of Behavioral Health and Development Services  
Tucker Pavillion  
Galveston Police Department  
United States Army  
Amecican Disabilities Act*

*I am seeking 5 Billion dollars in damages so I CAN DO EVERYONE'S JOB and fix the broken system myself. THANK YOU.*

**DEFENDANT ADDRESSES:**

Reggie Newsome  
4201 N. Bailey Bridge Road  
Midlothian, Va 23112

American Psychiatric Association  
800 Main Ave SW  
Washington, DC 20024

HCA Virginia Health Systems  
7101 Jahnke Road  
Richmond, Virginia 23235

Astra Zeneca  
701 Pennsylvania Ave  
NW #500  
Washington, DC 20024

Pfizer  
1211 Sherwood Ave  
Richmond, Virginia 23220

Johnson & Johnson  
One Johnson & Johnson Plaza  
New Brunswick, NJ 08933

Heart Havens  
812 Moorefield Park Dr  
#301  
North Chesterfield Va 23236

Child Protective Services  
801 E.Main Street  
Richmond, Va 23219

Phillip Marshall  
2006 Bremo Rd  
#101  
Richmond Va 23226

Mario Gomez and Meredith Ragan  
5918 Harbour Ln  
Midlothian Va 23112  
Anastasia Jones  
707 East Main Street  
Richmond, Va 23219

Powhatan High School  
1800 Judes Ferry Rd  
Powhatan Va 23139

Powhatan Sheriff's Department  
3880 Old Buckingham Road  
#A  
Powhatan, Va 23139

Powhatan-Goochland Mental Health  
3910 Old Buckingham Road  
#A  
Powhatan, Va 23139

Powhatan Rescue Squad  
3920 Marion Harland Lane  
Powhatan Va 23139

Richmond Behavioral Health Authority  
107 S 5<sup>th</sup> Street  
Richmond, Virginia 23219 AEG

Department of Behavioral Health and Development Services  
1220 Bank Street  
Richmond, Virginia 23219

Tucker Pavilion  
7101 Jahnke Road  
Richmond, Va. 23235

Galveston County Police Department  
601 54<sup>th</sup> St  
Galveston, Texas 77551

United States Army  
7833 Vervain Ct  
Springfield, Va 22152

American Disabilities Act  
?????????? AEG  
Congress???? General Assembly??? House of Representatives?

National Council on Disability  
1331 F NW  
Washington, DC 20004

Army Geist  
1/5/2018